

**USFS, R1, Custer
Gallatin National Forest**

Memo

To: 2810 Project File (Group Ten Metals Stillwater West Phase Two)

From: Hans Oaks

cc: Project NEPA file

Date: 5/23/2019

Re: Summary of Group Ten – Ph 2 Plan of Operations Amendments/Modifications

The purpose of this memo is to clarify for record, the amendments/modifications applied to the Group Ten Metals, Stillwater West Phase Two Plan of Operations for mineral exploration on NFS lands administered by the Beartooth RD (6 drill sites) and Yellowstone RD (29 drill sites).

June 20, 2018 Stillwater West Phase Two Plan of Operations – final (accepted as complete)

- Final revision of original Ph 2 proposed POO submission, dated **5/29/2018**.

Three Amendments/Modifications have been submitted to date that either provided a modification to the Plan or served as Group Ten's commitment to incorporate a change.

Amendment 01 – 8/6/2018

- Addition of 5 drill sites and 1 LZ
- Submitted to R. Grosvenor via email **8/6/2018**.

Amendment 02 – 10/25/2018

- In response to USFS IRA topic review and preliminary consideration of potential impacts given the 4 drill sites proposed within the IRA, the USFS (Seifert) consulted with Group Ten (Ostenson) to see if they would be willing to commit to “no tree cutting with the North Absaroka IRA”. This

G10 commitment and subsequent design feature/mitigation incorporated into Phase 1 (see G10 Ph1 Plan and Decision Memo).

- A total of 4 drill sites proposed for Phase 2 occur within this IRA area.
- A subsequent email provided on **10/26/2018** by Ostenson on behalf of Group Ten confirmed that the IRA activity commitment applied to Ph 2 also - “no tree cutting within the boundaries of the North Absaroka IRA” at, or to access, the 4 identified drill sites occurring there.
- This commitment by Group Ten in addition to their willingness to consolidate/cluster operations and uses (helicopter support and ground uses) were expressed again in a letter dated **12/4/2018** (see project file).

Amendment 03 – 3/22/2019

- In review of the proposed Plan of Operations the USFS noted that the proposal submitted had not been updated with the correct flight path map. The **6/20/2018** final shows a single flight path, initiating from Group Ten’s core shack located east of Nye, MT. The Phase 1 POO and decision included a modified flight path that provided for an alternate heliport located on PVT ranch lands along Limestone Road. Use of the Limestone Rd heliport as the primary helicopter base of operations was identified in Phase 1 as the preferred and required primary base of operations in order to minimize the potential impacts to Nye residents and avoid flight exposure over highways where feasible, and avoid key wildlife habitat areas/elements.
- An emailed formal request for the Phase 2 flight path amendment with an attached map were provided to the USFS (Oaks) by Group Ten (Ostenson) on **3/22/2019**.
- A final map was provided to Oaks on **3/25/2019** (see project file).

The 3 amendments/modifications to the Phase 2 Plan of Operations will be noted in the environmental assessment for the project. Any additional amendments/modifications submitted to the USFS by Group Ten prior to decision, will be documented and USFS resources specialists will be consulted to determine if additional analysis and/or mitigations are required. Such submissions or additional analysis or conditions to approval would be noted in final EA documentation.

/s/ Hans Oaks (Geologist, Custer Gallatin National Forest– detailed)